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Attorney for Respondents
 BATTERY TAI-SHING CORP., 100 BUSH CORP.,
 300 PROSPECT PROPERTIES, INC.,
 ALMADEN PLAZA PROPERTIES, LLC,
 BROTHERS INTERNATIONAL HOLDINGS CORP.,
 EDGEWATER HOLDINGS, CORP., DRAGON CAPITAL CORP.,
 SNAKE CAPITAL CORP., AND
 JANE WAI-PO KWAN REVOCABLE TRUST

UNITED STATES DISTRICT COURT
NORTHERN DISTRICT OF CALIFORNIA
SAN JOSE BRANCH

In re Application Pursuant to 28 U.S.C. § 1782)
 of Kwong Mei Lan Mirana,)

Applicant,)

vs.)

Battery Tai-Shing Corp., 100 Bush Corp., 300)
 Prospect Properties, Inc., Almaden Plaza)
 Properties, LLC, Brothers International)
 Holdings Corp., Edgewater Holdings, Corp.,)
 Dragon Capital Corp., Snake Capital Corp., and)
 Jane Wai-Po Kwan Revocable Trust,)

Respondents.)

Case No. MISC CV08-80142 JF (RS)

DECLARATION OF NICOLE M. NORRIS
IN SUPPORT OF RESPONDENTS'
OPPOSITION TO NOTICE OF MOTION
AND MOTION TO COMPEL
PRODUCTION OF DOCUMENTS AND
TESTIMONY IN COMPLAINEE WITH
SUBPOENAS AND CROSS-MOTION TO
QUASH

Date: January 21, 2008

Time: 9:30 a.m.

Place: Rm. 4, 5th Floor

1 I, Nicole M. Norris, declare:

2 1. I am an attorney at law, duly licensed to practice law in California and before this
3 Court. I am an associate with the law firm of Winston & Strawn LLP, counsel of record for Battery
4 Tai-Shing Corp., 100 Bush Corp., 300 Prospect Properties, Inc., Almaden Plaza Properties, LLC,
5 Brothers International Holdings Corp., Edgewater Holdings, Corp., Dragon Capital Corp., Snake
6 Capital Corp., and Jane Wai-Po Kwan Revocable Trust (“Respondents”), and am authorized to make
7 this declaration in that capacity.

8 2. Attached hereto as Exhibit A is what I am informed and believe to be a true and
9 correct copy of the October 13, 2008 Decision entered by Deputy District Judge K.W. Wong (the
10 “Decision”) in the Hong Kong divorce proceeding (“Divorce Proceeding”) between Applicant
11 Kwong Mei Lan Mirana and Joshua Kwan.

12 3. Attached hereto as Exhibit B is what I am informed and believe to be a true and
13 correct copy of the 5th Affidavit of Joshua Kwan submitted in the Divorce Proceedings on
14 November 26, 2008.

15 4. Attached hereto as Exhibit C is what I am informed and believe to be a true and
16 correct copy of the objections served in response to the subpoena Applicant attempted service on
17 Brothers International Holdings Corporation.

18 5. Attached hereto as Exhibit D is what I am informed and believe to be a true and
19 correct copy of the objections served in response to the subpoena Applicant attempted service on
20 Jane Wai-Po Kwan Revocable Trust.

21 6. Respondents were previously represented in connection with this matter by other
22 counsel. I am informed and believe that on or about October 23, 2008, former counsel for
23 Respondents met and conferred with Applicant’s counsel regarding the scope of the subpoenas
24 Applicant attempted service on Respondents. I am also informed and believe that at that meet and
25 confer, the parties discussed the possibility of producing only limited documents related to Joshua
26 Kwan’s salary and income earned from his work as Director and/or Officer of any Respondent, and
27 his ownership interest, if any, in Respondents. I am also informed and believe that counsel did not
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1 reach any definitive agreement on what would or would not be produced, but were in fact, still
 2 considering the options discussed at the meet and confer. Attached hereto as Exhibit E is what I am
 3 informed and believe to be a true and correct copy of the October 31, 2008 correspondence from
 4 William Hebert to Robert L. Ebe, former counsel for Respondents, confirming Applicant's counsel's
 5 positions with respect to the scope of the subpoenas that were discussed at the meet and confer.

6 7. Attached hereto as Exhibit F are true and correct copies of the Proofs of Service
 7 provided to me by Applicant's counsel.

8 I declare under penalty of perjury under the laws of the United States of America that the
 9 foregoing is true and correct.

10 Executed in San Francisco, California this 31st day of December, 2008.

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 12 /s/ Nicole M. Norris

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